

FENNEMORE CRAIG, P.C.

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Attorney for NIKKEI GLOBAL, INC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Nikkei Global, Inc., a California corporation,

CASE NO.: 2:18-cv-02013-JCM-EJY

Plaintiff,

vs.

**STIPULATION AND ORDER
[PROPOSED] REGARDING
EXTENSIONS OF TIME:**

Co-Partner Consortium (“Partner-CO”), a Nevada general partnership associated in fact and as an enterprise per 18 USCA § 1961(3); Mr. Phillip Ziade, Nevada resident and co-partner; Mr. Jude E. Nassar, an individual resident of Clark County, Nevada; Appleton Properties, LLC, a Nevada limited liability company; Z Leb Group, LLC, a Nevada limited liability company; Progressive Construction, Inc. a/k/a Growth Construction, a Nevada corporation; Growth Development, LLC a/k/a Growth Construction, a Nevada limited liability company; Vibrant Realty, LLC, a Nevada limited liability company; AJ Properties International, LLC, a/k/a AJ1, a Nevada limited liability company; AJ Properties International Series 2 LLC, a/k/a AJ2, a Nevada limited liability company; Growth Holdings, a Nevada corporation; Growth Luxury Homes, LLC, a/k/a GLH, a Nevada limited liability company; Growth Luxury Realty, LLC, a/k/a GLR, a Nevada limited liability company; Mr. Yoshimi Hirooka, a resident of Japan or Singapore, doing business in Nevada; Mr. Yoshihiro Hirooka, a resident of Japan or Singapore doing business in Nevada; Hirooka Family Office, Ltd., a foreign organization doing business in Nevada,

**(1) TO FILE RESPONSE AND REPLY TO
MOTION TO DISMISS [ECF No. 70]; And**

**(2) TO MAKE INITIAL DISCLOSURES
PURSUANT TO JOINT DISCOVERY
PLAN [ECF No. 71]**

Defendants.

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As such, the Parties stipulate as follows:

(1) Plaintiff NGI shall have until and through November 25, 2019 to file its Response to the Ziade Defendants' new and pending Motion to Dismiss [ECF No. 70];

(2) Ziade Defendants' shall have until and through December 13, 2019 to file its Reply to NGI's Response to the Ziade Defendants' new and pending Motion to Dismiss [ECF No. 70];

(3) The Parties shall have until and through December 9, 2019, to make their initial disclosures (with no other dates in the Plan being changed at this time).

DATED: November 14, 2019

FENNEMORE CRAIG, P.C.

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Attorneys for the Growth Defendants

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: November 21, 2019